

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mohammed Keita

Write the full name of each plaintiff.

CV _____

(Include case number if one has been assigned)

-against-

College of Staten Island (CUNY)

COMPLAINT

Do you want a jury trial?
 Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question
- Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

College of Staten Island (CUNY)
is a participants in Federal
Student Loan Program and FAFSA.
Alleged Discrimination and Stalking.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Mohammed Kaita,
(Plaintiff's name) is a citizen of the State of

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

New York.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, College of Staten Island,
(Defendant's name) is a citizen of the State of

New York

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

New York.

If the defendant is a corporation:

The defendant, New York, is incorporated under the laws of

the State of New York

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) New York

and has its principal place of business in New York.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Mohammed

First Name

Middle Initial

Last Name

863 Father Capodanno Blvd.

Street Address

Richmond, Staten Island, NY 10305

County, City

State

Zip Code

929-314-6915

Telephone Number

Email Address (if available)

mohammedkcita87@gmail.com

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

additional pages if needed.

College of Staten Island (CUNY)
Bursar, Financial Aid, & Registrar Office

Current Job Title (or other identifying information)
2800 Victory Blvd, Building 2A Rm 401

Current Work Address (or other address where defendant may be served)
Staten Island, New York 10305

County, City	State	Zip Code

Defendant 2:

First Name _____ Last Name _____

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County City **State** **Zip Code**

Defendant 3:

First Name _____ **Last Name** _____

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City **State** **Zip Code**

Defendant 4:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

College of Staten Island (CUNY)

Date(s) of occurrence:

01/30th/2023

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Mohammed Kaita Student ID# 24013244 Request for Full Reimbursements for all tuitions from Spring/2020 to Current year of Spring/2023. And, Notification of Direct Loan Disbursement Refund not done in good faith, rather malice intend to take my money without good cause. Request for full reimbursements for all tuitions from Spring/2020 to Current is legally Cognizable as accepted for the following reasons with merits as follow: (1) It's kicked out of School without good cause for not having my vaccine as alleged. Nevertheless, already had my first BSC degree with previous vaccination with St. Francis College that College of Staten Island Health department had the right to access to cured that requirement in New York to stay in classes.

College of Staten Island knowingly accepted my registration without preconditions or restriction than. College of Staten Island had arrays of rights to alternate resolutions. But, neglected. (2) COV-19 as a Global Pandemic in 2020 caused the closures of all classes. Stop going to School due to no fault of mine therefore entitle to full refund. (3) Upon returning last Semester, provided "CSI" with one proof of Vaccination. Registration for in person was accepted without preconditions. "CSI" latter suspended/hold my in person attendance for lack of second vaccine. Was forced to leave school with threat of been kicked out. NYS mandate for COV-19 was One shot. Timely withdrawn from all classes with sufficient proof.

INJURIES:
If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Cause me financial injuries for tuitions paid with Federal Loans, lost time in classes, threat of Stalking causes emotional distress. But, not limited to.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Requesting for full return of all my funds immediately including all tuitions and fees from Spring 2020 to Current. And, Compensation for neglect and emotional distress from Stalking.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

04/11/2023

Dated

Mohammed

First Name

Middle Initial

Plaintiff's Signature

Street Address

863 Staten Island

Last Name

Karla Capodanno Blvd

Middle Initial

State

NY

Zip Code

County, City

10305

Telephone Number

929-314-6915

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



United States District Court
Southern District of New York

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

500 PEARL STREET | NEW YORK, NY 10007
300 QUARROPAS STREET | WHITE PLAINS, NY 10601

PRO SE INTAKE UNIT: 212-805-0175

rev. 2/9/15

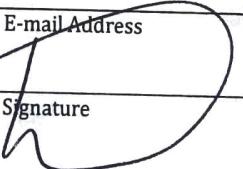
CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)		Mohammed		
Name (Last, First, MI)	Kaita	Address	863 Fr. Capodanno Blvd, Staten Island, NY 10309	Zip Code
Address	863 Fr. Capodanno Blvd, Staten Island, NY 10309	City	Staten Island	State
Telephone Number	929-314-6915	E-mail Address		
Date	6/4/2023	Signature		

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007



COVID-19 Related
Documentation Support Form
Student Financial Aid

Fall/2022

Term:

Complete this form to document how Coronavirus (COVID-19) has impacted your ability to participate in academic and college-related activities.

Full Name:

Kerita Mohammed

Last

First

M.I.

Date:

01/30th/2023

College:

College of Staten Island

EMPL ID:

24013244

Phone:

347-283-3674

Email:

mohammedKerita87@gmail.com

Provide specific details on how you are impacted by COVID-19. You may attach additional supporting documentation, if applicable.

Example Scenarios

- A student was enrolled or was supposed to begin a travel-abroad experience and either the student has been called back to the U.S. or was never able to begin the travel abroad experience;
- A student was enrolled in a program and met the requirements for full-time enrollment; however, due to the COVID-19, one or more classes – such as an internship, a clinical rotation, student teaching or fieldwork – has lowered the credit enrollment for term
- A student is quarantined and misses class or a student is incapacitated due to COVID-19 illness;
- A campus temporarily stops offering ground-based classes in order to prevent the spread of COVID-19.